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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

LYLE STEED JEFFS, et. al.,

Defendant.

Case No. 2:16-CR-82-TS

**SUPPLEMENTAL EXHIBITS 55 – 76-1 IN  
SUPPORT OF MOTION FOR  
DETENTION**

Magistrate Judge Robert T. Braithwaite  
District Court Judge Ted Stewart

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The United States respectfully submits Exhibits 55 – 76-1 in support of its Motion for Detention. ECF No. 6.

**Summary of Exhibits**

The records contained in Exhibits 55 -70 consist of documents from the “Dictations of Warren Jeffs” and “The Record of President Warren Jeffs.” These documents were retrieved on or about April 6, 2008 by law enforcement during the search of the YFZ Ranch near El Dorado, Texas. They corroborate the evidence contained in the Motion for Detention demonstrating that Defendant Lyle Jeffs presents a serious risk of flight and a serious risk of obstructing or attempting to obstruct justice.

Exhibits 71-72 are letters from Isaac Jeffs to Warren Jeffs. These documents were also retrieved on or about April 6, 2008 by law enforcement during the search of the YFZ Ranch near El Dorado, Texas. They further corroborate the writings and records of Warren Jeffs regarding Defendant Lyle Jeffs' risk of flight and risk of obstruction of justice.

Exhibits 73-75 are a newspaper article, an interview report of Willie Jessop, and an interview report of Dwayne Barlow regarding Lyle Jeffs' flight risk and efforts to help others avoid law enforcement.

Finally, Exhibits 76 and 76-1 constitute a news report quoting Defendant Lyle Jeff's son, Thomas Jeffs, about Defendant Jeffs' belief that he was "10 steps ahead of the government." This demonstrates Defendant Jeff's disdain for the government and is evidence of his lack of respect for governmental authority. It is evidence that Defendant Jeffs would likely disregard any conditions the court might impose to prevent his flight and obstruction of justice.

These exhibits are further evidence that this case involves a serious risk that Mr. Lyle Jeffs will flee and a serious risk that he will obstruct or attempt to obstruct justice. 18 U.S.C. § 3142(f)(2). The exhibits show that Mr. Jeffs has a history of (i) evading law enforcement, (ii) helping others to evade law enforcement, (iii) hiding evidence, and (iv) providing financial and other assistance to Warren Jeffs when he was a fugitive. They also demonstrate his knowledge of secret "places of refuge" that he could use to avoid detection.

The following are relevant excerpts from each exhibit:

**I. Exhibits 55-70: The Dictations and Records of Warren Jeffs**

**1/9/2004--Lyle Trained by Warren Jeffs About Secret Lands of Refuge (Exhibit 55)**

The government has been working to come against me and arrest me for some time now. The Lord has held them back. But through that experience, He impressed me that I must seek a place of refuge where I could hide away and not be taken to prison so I could continue the Lord's work upon the earth. He led me to a place. He opened the way and we purchased that place. And after we had that in our hands, then the Lord started leading me throughout the United States. And He led me many places that He rejected. He then led me many places that He accepted. And He showed me as I went along that this people will be scattered and driven but He would open the way.

**9/4/2004—Warren Jeffs Instructs Lyle Jeffs to Travel in Disguise (Exhibit 56)**

I called the Bishop, \_\_\_\_\_, and named the ladies to travel with him and Lyle to come disguised as they could and not be followed. I told him to have the men travel in a separate car and go the other way. And everyone arrive at Page, Arizona by 8:00.

**9/5/2004—Warren Jeffs Instructs Lyle Jeffs Regarding Removal of Records Relevant to Lawsuit (Exhibit 57)**

\_\_\_\_\_ was named in the lawsuit and the evil powers intended to get hold of his records to testify against me and father in the handling of unworthy people as we often used \_\_\_\_\_ to do that work.

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I was very direct warning \_\_\_\_\_. I instructed him to gather his computers, his papers and box them up and right at noon leave his office open and I would send someone in to get those things without him seeing or knowing where they went, the records, and he could return to his office.

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I had called my brother Lyle Jeffs the night before and gave him instructions. I called him Wednesday morning and told him to go to the back door of \_\_\_\_\_ office in Short Creek which is across the street from the Colorado City town hall and go in and get all

the archive materials, put it in a van and drive to Denver where he would meet my brother Seth Jeffs. I called Seth and told him to drive to Denver and meet Lyle and pick up the archive materials and in the middle of the night Thursday night he would drive into R 1 and wait there for my instructions and deliver the archive materials. Lyle did so.

**6/1/2005--Warren Jeffs Describes Lyle Jeffs Sending Away FLDS Members (Exhibit 58)**

I told Lyle Jeffs, with these two witnesses present, to call in \_\_\_\_\_. and also \_\_\_\_\_, and also \_\_\_\_\_. and tell them they did not hold Priesthood. And if they would receive the Lord's council and directive, to leave UEP land. Their families are released. They have no sealing, and they are to go a distance from the Priesthood people and from apostates, write letters of confession, and begin their repentance, confessing why they lost Priesthood. I directed him to tell \_\_\_\_\_ that he and his son \_\_\_\_\_ should leave and \_\_\_\_\_ help take care of him, and perhaps other sons would be sent to give him earthly assistance of moneys and needs . . . At 3:35p.m. I called Lyle Jeffs. He reported to me that he gave the message to all three men and it was done.

**6/6/2005—Lyle Jeff Reports to Warren Jeffs about FLDS Members Avoiding Service of Papers (Exhibit 59)**

There was a hearing today, where the Attorney-General of Utah went before the judge asking to make the May 27, 2005 order permanent dismissing the present trustees of the United Effort Plan. The court ordered a ten day postponement. We only assume it is because they did not give any of the trustees service of the papers, and to give more time for the public notice through the newspapers to be given. Lyle Jeffs told me that \_\_\_\_\_ was staying out of the way, and his family was staying isolated.

**9/20/2005--Warren Jeffs Gives Lyle Jeffs Instructions About Sending Away FLDS Members (Exhibit 60)**

Around 12:30 p.m. in the afternoon, I called Lyle Jeffs, because the Bishop was not in Short Creek, and I told Lyle that the Lord wanted \_\_\_\_\_, the son of \_\_\_\_\_, handled and sent away, called to repent from a distance. I told Lyle to gather \_\_\_\_\_ and \_\_\_\_\_ as witnesses and tell \_\_\_\_\_ that he did not hold Priesthood, his family was released, and he should repent from a distance.

**11/15/2005—Lyle Jeffs Reports to Warren Jeffs about FBI Questioning of Seth Jeffs; Warren Jeffs Instructs Lyle Jeffs What to Tell Law Enforcement (Exhibit 61)**

I called Lyle Jeffs and had him read to me Seth's letter to me describing his experience with the police and F.B.I. taking him. I learned from that that Seth had just declared he was on a Church errand. I told Lyle Jeffs that he, Lyle, should write a letter or affidavit saying that he sent Seth on this errand. Neither he nor Seth must tell where the monies are used, where the archives are kept, or any Church business, only acknowledge the truth that Seth Jeffs and \_\_\_\_\_ were on a Church errand. Seth in his explaining how tithing works told the F.B.I. that even if monies and checks and letters are written to Warren Jeffs containing money it is the Bishop that takes care of the monies in the Church, showing that he wasn't taking these monies directly to me. I told Lyle to help Seth and be on hand, but neither of them must betray the redemption of Zion mission or the Church officials. They can only acknowledge that Seth was on a Church errand and not give any description of where the monies are used or the archives are kept.

**12/31/2005—Lyle Jeffs has \$300,000 in a Hidden Account for Use by Warren Jeffs (Exhibit 62)**

The Bishop then told me that he had failed to inform me and was informing me now that \_\_\_\_\_ had already set aside seven hundred thousand dollars for Priesthood building projects. He also told me that Lyle Jeffs had three hundred thousand dollars in a hidden account that we could use for purchasing.

**1/23/2006—Lyle Jeffs Writes to Warren Jeffs about Evading FBI Service of Subpoena; Men following counsel to "Answer them nothing." (Exhibit 63)**

As the FBI broke in, the signal was quickly passed on and my escape via four wheeler out of the west ramp, was made successfully just prior to them shutting that exit off. I traveled down the creek bed to the asphalt plant and left town from there. Word was quickly given to the men as the list was acquired from the officers, for them to get out of the way until counsel could be received. As the officers came into the room, with the determination to take over the meeting, the congregation was immediately excused and the mike shut off. This frustrated the officers to the point that they have threatened to file charges of 'obstructing justice' against the man that dismissed the meeting.

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The counsel has been given them to answer them nothing. There seems to be a oneness of the conviction of obedience in all of the men.

**3/30/2006—Lyle Jeffs Forwards over \$1 million to Fugitive Jeffs (Exhibit 64)**

I put on record that our count of these monies Lyle Jeffs sent to us this last time. The total was more then we have thought. The total money we received, still without counting every bundle, there was more. It was a total of 1,282,000 dollars. Of that we have spent 15,000 dollars on this building project at R17. 500,000 dollars going to R17 projects, and the rest will be distributed to the other lands of refuge and the houses in hiding.

**4/11/2006—Lyle Jeffs Prepared to Drive Motorhome to Act as Courier for Warren Jeffs (Exhibit 65)**

And Lyle is in place alone in a motorhome, ready to go where I direct, to do the transfer of my letters and other things he has for us.

**5/6/2006—Lyle Jeffs Acted as Courier of Money and Mail for Warren Jeffs (Exhibit 66)**

Then the Lord took me back in session and showed me that \_\_\_\_\_ and \_\_\_\_\_ should R17 and drive to Dallas at 11:00 a.m. and meet Lyle Jeffs and there get he [sic.] Priesthood packages, monies and mail. The recording got to \_\_\_\_\_ just before 11:00 a.m. and he left immediately.

**5/6/2006—Lyle Jeffs Again Forwards over \$1 million to Warren Jeffs (Exhibit 67)**

I put on record that we received tonight from the tithing and consecrations from Short Creek, one million eighty-five thousand eight hundred dollars. That is by Lyle Jeffs count. We did not count every package and bundle. But went by his count and labeling. It is marvelous to receive over one million dollars in a time of persecution and driving. I acknowledge the Lord in it, and I have dedicated these monies unto the Lord seeking His guidance, where to use them in this mission. I now have much mail to read, and I will go the Lord's pace.

**5/29/2006—Lyle Jeffs Reports to Warren Jeffs Regarding Thwarted Police Search for Information on Underage Marriages (Exhibit 68)**

Then I called Lyle Jeffs, who gave me more information. Lyle told me that last Thursday, approximately sixteen sheriffs department police invaded the community with search warrants right into the houses of the men who are arrested for underage marriages. Men like \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_ is his name now. Some of these families had moved so the police rushed through other people's home, thinking it was the addresses of the men who were arrested. They were trying to gather information, documents, and also get DNA samples of the first wife and the child

and the father, to prove that the children born were not from the first wife. Most of the men already had their families out of circulation, they were already in hiding. So the police ended up short on much of what they were looking for.

**6/7/2006—Lyle Jeffs to Forward Money for Houses of Hiding (Exhibit 69)**

He reported that he used twenty-six thousand dollars of Priesthood money, consecrations, for these houses in hiding project from Lyle Jeffs because it is hard to get cash out of his business without being traced. I told him, do what he needed to do for the houses in hiding, from Lyle Jeffs, as far as the monies were concerned.

**6/15/2006—Warren Jeffs Instructs Lyle Jeffs to be Careful In Phone Calls (Exhibit 70)**

I talked to John Wayman before I called the Bishop and told \_\_\_\_\_ that we needed to exert greater faith, and be careful in our phone calls, and not call into Short Creek and give any messages of what I need done. We must talk to people face to face, and have them go out of Short Creek for phone calls. I gave this training to the Bishop, to Lyle, to \_\_\_\_\_, to \_\_\_\_\_, to \_\_\_\_\_ today.

**II. Exhibits 71 -72: Letters from Isaac Jeffs**

**2/8/2006—Letter from Issac Jeffs to Warren Jeffs regarding Lyle Jeffs' Efforts to Help Witnesses Avoid Answering Questions in a Court Hearing (Exhibit 71)**

[Lyle] said that all of our men were very anxious to follow your every directive and that were so much so that they would not even give them their last names, middle names, ages, or anything. The judge became very upset toward them and said that he wanted to have all 6 of our men in his chambers at 8:00 AM in the morning to tell them what will happen to them if they do not answer the questions, that they would be held in contempt.

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Lyle wondered if he should tell the men to go ahead and give their names, (because they already have all of that information) and then use the 1<sup>st</sup> and 5<sup>th</sup> Amendments on the pertinent questions when they got to them? He wondered if he should answer them on that by 8:00 AM. He said he did not want to put his own idea in but wanted to give the facts and do it exactly the way you wanted.

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Lyle said that all of the men were willing to, and are "Answering them nothing," as you said and wanted to do your will exactly.

**3/14/2006—Letter from Isaac Jeffs to Warren Jeffs regarding Lyle Jeffs' New Phone Numbers (Exhibit 72)**

[Lyle] said they were on I-15 north of St. George. I gave him the message not to call his family while he was on this errand and he said he would not call them. He gave two phone numbers that are brand new and would have them on.

**III. Exhibits 73-75: Newspaper Story, Statements of Willie Jessop and Dwayne Barlow**

**Newspaper Summary of Trial Testimony Regarding ATV Escape (Exhibit 73):** At the ongoing Civil Rights trial involving Hilldale and Colorado City pending in Arizona, Dwayne Barlow testified regarding Lyle Jeff's extensive efforts to evade service of a subpoena by the FBI. Mr. Barlow testified, among other things that:

- Two ATV's had been stored in the basement of an FLDS meeting house;
- Lyle Jeffs had Mr. Barlow buy several camouflage hoods from Cabella's in Lehi. The hoods were placed on the ATVs;
- When the FBI arrived at the meeting to serve subpoenas, FLDS church security slowed the FBI's progress by asking the FBI to give them time to pray and by obstructing the FBI without becoming a physical threat.
- Lyle Jeffs and one of his assistants put the camouflage masks over their heads and escaped on the ATV's hidden in the basement.

**Willie Jessop's Statements to Investigators Regarding Participation in ATV Escape (Exhibit 74):** Mr. Barlow's statements, as reported in the newspaper article, regarding the escape are confirmed by Willie Jessop, who told investigators of his role in the events. Mr. Jessop served as an armed protector of Lyle Jeffs, and he helped Defendant Jeffs escape on the ATV, obtain motorcycles and other transportation, and ultimately flee to Las Vegas, Nevada.

**Statements of Dwayne Barlow to Investigators (Exhibit 75)** Mr. Barlow also told investigators:



- On January 14, 2006, immediately following the FBI's attempted service of subpoenas at the LSJ Meetinghouse, Defendant Jeffs telephonically contacted Mr. Barlow multiple times while Defendant Jeffs was fleeing. He asked Mr. Barlow to inquire about the FBI's interest in him [Lyle Jeffs]. Defendant Jeffs instructed Mr. Barlow to tell everyone who was on the subpoena list to get out and away from town, and that Defendant Jeffs would contact them later. Defendant Jeffs supervised the disappearance of men who were not served by the FBI, including John Wayman.
- Following the raid, Defendant Jeffs instructed that no one should talk to any law enforcement. He also instructed Mr. Barlow and others on how to go undercover. He gave instructions to grow beards, mustaches, and wear t-shirts, shorts, and other disguises to avoid being discovered.
- Defendant Jeffs instructed Mr. Barlow to transport Defendant Jeffs' wives to a house of hiding in Las Vegas, Nevada, where Mr. Jeffs was staying.
- Defendant Jeffs supervised the disappearance of the "Colorado City eight", and the Texas men who were indicted.
- Lyle provided instructions to each man to continue fleeing from law enforcement, or if they should surrender to authorities.
- Mr. Barlow has learned that at the time of the February 23, 2016 arrest of Defendants Jeffs and Wayman, there were members of FLDS security and spotters in and around the building.
- Defendants Jeffs and Wayman have a network of personal security to help them flee.

**IV. Exhibit 76 and 76-1: 2/24/2016 News Report Quoting Lyle Jeff's Son, Thomas Jeffs**

On February 24, 2016, a reporter from KUTV news interviewed Defendant Lyle Jeffs' son, Thomas Jeffs, after Defendant Jeffs' initial appearance. With respect to the SNAP fraud, Thomas Jeffs told the reporter "When I was in the church I asked him why we are doing that and he says we will be fine and we are 10 steps ahead of the government there is nothing to fear." A disc containing the video news report has been included with this submission and will be provided to defense counsel (Exhibit 77-1).

Dated this 3rd day of March, 2016.

JOHN W. HUBER  
United States Attorney

/s/ Tyler L. Murray  
Tyler L. Murray  
Assistant United States Attorney